

[Proposed] Lead Counsel for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KALMAN ISAACS, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

ELON MUSK, et al.,

Defendants.

) Case No. 3:18-cv-04865-EMC

) CLASS ACTION

) [PROPOSED] ORDER CONSOLIDATING
) RELATED ACTIONS, APPOINTING LEAD
) PLAINTIFF, AND APPROVING
) SELECTION OF COUNSEL

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Having considered Dany David's Motion for Consolidation of Related Actions, Appointment as Lead Plaintiff, and Approval of Selection of Counsel (the "Motion") and good cause appearing therefor, the Court ORDERS as follows:

1. The Motion is GRANTED;

2. Pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, the following Related Actions are consolidated as *In re Tesla Inc. Securities Litigation*, Master File No. 18-cv-04865-EMC:

CASE TITLE	CASE NUMBER	CLASS PERIOD ALLEGED	DATE FILED
<i>Isaac v. Musk, et al.</i>	3:18-cv-04865-EMC	08/07/2018- 08/08/2018	08/10/2018
<i>Chamberlain v. Tesla, Inc., et al.</i>	3:18-cv-04876-EMC	08/07/2018- 08/10/2018	08/10/2018
<i>Yeager v. Tesla, Inc. et al.</i>	3:18-cv-04912-EMC	08/07/2018- 08/09/2018	08/13/2018
<i>Maia v. Tesla, Inc., et al.</i>	3:18-cv-04939-EMC	08/07/2018- 08/14/2018	08/14/2018
<i>Dua v. Tesla, Inc. et al.</i>	3:18-cv-04948-EMC	08/07/2018- 08/08/2018	08/15/2018
<i>Horwitz v. Tesla, Inc., et al.</i>	3:18-cv-05258-EMC	08/07/2018- 08/17/2018	08/28/2018
<i>Left v. Tesla, Inc., et al.</i>	3:18-cv-05463-EMC	08/07/2018- 08/17/2018	09/06/2018
<i>Fan v. Tesla, Inc., et al.</i>	3:18-cv-05470-EMC	08/07/2018- 08/17/2018	09/06/2018
<i>Sodeifi v. Tesla, Inc., et al.</i>	3:18-cv-05899-EMC	08/07/2018- 08/10/2018	08/30/2018 ¹

(a) The file in Case No. 18-cv-04865-EMC shall constitute the master file for every action in the consolidated action. When the document being filed pertains to all actions, the phrase "All Actions" shall appear immediately after the phrase "This Document Relates To:" When a pleading applies to some, but not all, of the actions, the document shall list, immediately after the phrase "This Document Relates To:", the docket number for each individual action to which the document applies, along with the last name of the first-listed plaintiff in said action;

¹ The *Sodeifi* Action was initially filed in the United States District Court for the Central District of California, and was subsequently transferred to this District on September 24, 2018.

1 (b) All securities class actions relating to the same or substantially similar alleged
2 wrongdoing by defendants on behalf of the same or substantially similar putative class that is
3 subsequently filed in, or transferred to, this District shall be consolidated into this action. This Order
4 shall apply to every such action, absent an order of the Court. A party objecting to such
5 consolidation, or to any other provisions of this Order, must file an application for relief from this
6 Order within ten days after the date on which a copy of this Order is mailed to the party's counsel;

7 This Order is entered without prejudice to the rights of any party to apply for severance of
8 any claim or action, with good cause shown;

9 3. Pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-
10 4(a)(3)(B), Dany David is appointed as Lead Plaintiff; and

11 4. Pursuant to 15 U.S.C. §78u-4(a)(3)(B)(v), Robbins Geller Rudman & Dowd LLP and
12 Lieff, Cabraser, Heimann & Bernstein, LLP are approved as Lead Counsel.

13 IT IS SO ORDERED.

14 DATED:

THE HONORABLE EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE